

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Gregory Levorner Lunsford

Case No. Case: 2:23-mj-30125

AMENDED
CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 11, 2023 in the county of Macomb and Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

21 U.S.C. § 841(a)(1)

Possession with intent to distribute fentanyl.

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: March 29, 2023City and state: Detroit, MI*Complainant's signature*

Jeffrey Jacobs, Special Agent, FBI

Printed name and title*Judge's signature*

Hon. Anthony P. Patti, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Jeffrey Jacobs, being duly sworn, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such. I have been employed as a Special Agent since January 2005 and am currently assigned to the FBI Oakland County Gang and Violent Crime Task Force (OCGVCTF). I have conducted and participated in numerous criminal investigations including bank robberies, violent crimes, extortionate extensions of credit, carjacking, gang related shootings, interstate theft, and narcotics trafficking.

2. I make this affidavit from personal knowledge based on my participation in this investigation, communications with others who have personal knowledge of the events and circumstances described herein, review of police reports, and information gained through training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and, therefore, does not contain all details or all facts of which I am aware relating to this investigation.

3. In January 2023, officers from the St. Clair Shores Police Department (SCSPD) were investigating Gregory Levorner LUNSFORD (XX/XX/1965) for suspected narcotics trafficking. On January 11, 2023, officers conducting surveillance on LUNSFORD saw him leave his home at XXXX7 Joplin, Clinton

Township, Michigan in a gray Jeep Compass. LUNSFORD had an adult male passenger with him. Officers followed LUNSFORD to the area of Irvington and State Fair in the city of Detroit.

4. While surveilling LUNSFORD near Irvington and State Fair, officers observed multiple people approach LUNSFORD's Jeep and exchange items with him, consistent with being narcotics transactions. LUNSFORD then departed the area in the Jeep. SCSPD officers followed LUNSFORD back to Clinton Township.

5. After LUNSFORD—who officers knew had a suspended driver's license and a valid felony warrant out of Macomb County's 16th Circuit Court—returned to Clinton Township, an officer from the Clinton Township Police Department (CTPD) effectuated a traffic stop on LUNSFORD's Jeep at the request of the SCSPD. The CTPD officer placed LUNSFORD under arrest for the felony warrant. While searching LUNSFORD, the CTPD officer found two suspected crack cocaine rocks packaged in clear plastic in LUNSFORD's pocket.

6. During the traffic stop, an officer from the SCSPD removed LUNSFORD's passenger from the vehicle and requested assistance from an MSP K9 unit. A short time later, an MSP K9 trooper arrived at the scene of the traffic stop and, with his canine partner, conducted a walk-around of LUNSFORD's Jeep. The canine positively indicated to the odor of narcotics on both the exterior and interior of the vehicle. SCSPD officers searched LUNSFORD's Jeep and recovered

two packages under the fabric of the passenger seat. The two packages contained suspected heroin packaged for sale in hundreds of lotto folds.

7. Officers field tested the suspected crack cocaine recovered from LUNSFORD's pocket, which tested positively as cocaine. Officers inventoried and tested both the cocaine and suspected heroin at the SCSPD. The cocaine weighed 11 grams, including packaging. In the two packages recovered from the front seat of LUNSFORD's Jeep, there were 480 lotto folds of suspected heroin, weighing a total of 84 grams, with packaging. The suspected heroin was tested using TruNarc and tested positively as fentanyl.

8. Officers submitted the suspected cocaine and fentanyl to the Oakland County Forensic Laboratory for further testing. On March 15, 2023, an examiner at the Oakland County Forensic Laboratory reported that the two cocaine rocks recovered from Lunsford's pocket tested positively as cocaine and weighed 9.43 grams and 0.46 grams. The examiner also examined the two packages of fentanyl recovered from the front seat of LUNSFORD's Jeep. The examiner reported that there were 240 lotto folds in each of the packages. The examiner tested the fentanyl from one lotto fold from each package. The substances tested positive for fentanyl and weighed .0443 grams and .0462 grams.

9. Based on my training and experience, I believe that based on the quantity of fentanyl recovered from Lunsford's Jeep, and the manner in which it

was packaged, there is probable cause to believe that LUNSFORD possessed the fentanyl with intent to distribute it.

10. Based on the above information, there is probable cause to believe that Gregory Levorner LUNSFORD possessed with the intent to distribute a mixture or substance containing fentanyl, in violation of 21 U.S.C. § 841(a)(1).

Respectfully submitted,



Special Agent Jeffrey Jacobs
FBI Oakland County Gang/Violent Task Force

Sworn to before me and signed in my presence and/or by reliable electronic means.



Honorable Anthony P. Patti
United States Magistrate Judge

Dated: March 29, 2023